

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA**

In re:)	
)	
Alevo Manufacturing, Inc.)	
Alevo USA, Inc.)	Case Nos. 17-50876 &
)	17-50877
)	
Debtor.)	Chapter 11
)	(Jointly Administered)
)	

MOTION TO APPEAR PRO HAC VICE
(Jonathan W. Jordan)

PURSUANT TO LBR 2090-1, Chelsea Corey of the law firm of King & Spalding LLP, respectfully moves the Court to admit Jonathan W. Jordan (“Mr. Jordan”) *pro hac vice*, for the purpose of appearing as counsel on behalf of Bootsmead LeaseCo, LLC (“Bootsmead”), as counsel in the above-captioned jointly administered cases.¹ In support of this motion, the undersigned states:

1. Mr. Jordan is an attorney in good standing and is licensed to practice law in Georgia since 2002 (Bar No. 404874). He also is admitted in the following courts:

¹ On August 23, 2017, five days after the Debtors filed their chapter 11 petitions, lead counsel for Bootsmead filed a motion for admission *pro hac vice* (ECF Nos. 11 and 12). Shortly after the motion was filed, the assistant to Bootsmead’s counsel received a message from the Bankruptcy Court Clerk’s office informing her that a *pro hac vice* application was unnecessary, and that a notice of appearance was the only filing necessary. Mr. Jordan assumed the call from the Clerk’s office reflected a local difference from the firm’s usual practice of filing *pro hac vice* applications in cases in which they appeared. Accordingly, lead counsel withdrew the pending *pro hac vice* application, and filed their notices of appearance (ECF Nos. 20, 21 and 36). The miscommunication seems to be that the Clerk’s office was speaking of an appearance to receive notices, but counsel’s assistant interpreted the message to mean that *pro hac vice* application was also unnecessary to participate in the case. (At the time the *pro hac vice* application was filed, Bootsmead had also not been approached to be the DIP lender.) Mr. Jordan regrets his error, and has conferred with local counsel from its Charlotte, North Carolina office and carefully reviewed all local rules of this Court to ensure full compliance.

United States District Court for the Northern District of Georgia; United States District Court for the Middle District of Georgia.

2. Mr. Jordan is an associate with the law firm of King & Spalding LLP, and primarily practices in Atlanta, Georgia, where his office is located at 1180 Peachtree Street, Atlanta, GA 30309.

3. Mr. Jordan is not currently subject to disciplinary action with respect to the practice of law.

4. Mr. Jordan has not been disciplined by any court or administrative body.

5. In the past three years, Mr. Jordan has not filed for permission to appear *pro hac vice* in any court within the State of North Carolina.

6. Mr. Jordan has read and is familiar with the Local Rules, Federal Rules of Bankruptcy Procedure, Federal Rules of Civil Procedure, and the Federal Rules of Evidence.

7. By his accompanying statement, Mr. Jordan certifies that he will abide by all rules, practices, ethics and submits to this disciplinary jurisdiction for any misconduct in connection with this chapter 11 case that are applicable to all other attorneys admitted to practice before the United States Bankruptcy Court for the Middle District of North Carolina.

8. Mr. Jordan is familiar with this case and has been requested by Bootsmead LeaseCo, LLC to be actively involved in its representation as a creditor of the Debtor, appearing with local counsel from the law firm of King & Spalding.

9. The required filing fee for admission of an attorney *pro hac vice* will be

tendered upon entry of the attached order.

WHEREFORE, the undersigned respectfully moves the Court to admit Jonathan W. Jordan *pro hac vice* to the Bar of this Court for the purpose of participating in this case as counsel and for all other relief that may be appropriate and just.

Dated: December 27, 2017

Respectfully submitted,

/s/ Chelsea Corey

Chelsea Corey
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Local Counsel for Bootsmead LeaseCo, LLC

Jonathan W. Jordan (*pro hac vice pending*)
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GA State Bar No. 404874
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Counsel for Bootsmead LeaseCo, LLC

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Debtor.)	Chapter 11
)	(Jointly Administered)
)	

CERTIFICATION OF JONATHAN W. JORDAN

I, Jonathan W. Jordan, certify as follows:

1. I am an associate with the law firm of King & Spalding LLC and primarily practice in Georgia, where my office is located at 1180 Peachtree Street, Atlanta, GA 30309.

2. I am in good standing and am licensed to practice law in Georgia since 2002 (Bar No. 404874). I also am admitted in the following courts: United States District Court for the Northern District of Georgia; United States District Court for the Middle District of Georgia.

3. I am not currently subject to disciplinary action with respect to the practice of law.

4. I have not been disciplined by any court or administrative body.

5. I have not filed for permission to appear *pro hac vice* in the preceding three years in any court within the State of North Carolina.

6. I am familiar with the Local Rules, Federal Rules of Bankruptcy

Procedure, Federal Rules of Civil Procedure and the Federal Rules of Evidence.

7. I am familiar with this case and have been requested by Bootsmead LeaseCo, LLC to be actively involved in their representation as creditors in this Chapter 11 bankruptcy case.

8. I certify that I will abide by all rules, practices, ethics and submit to this disciplinary jurisdiction for any misconduct in connection with this case that are applicable to all other attorneys admitted to practice before the United States Bankruptcy Court for the Middle District of North Carolina.

9. I am familiar with this case and have been requested by Bootsmead LeaseCo, LLC to be actively involved in its representation as a creditor of the Debtor, appearing with local counsel from the law firm of King & Spalding LLC.

Dated: December 27, 2017

/s/ Jonathan W. Jordan

Jonathan W. Jordan
(*pro hac vice pending*)
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Counsel for Bootsmead LeaseCo, LLC

CERTIFICATE OF SERVICE

I certify that on December 27, 2017, I caused to be served copies of the foregoing MOTION TO APPEAR PRO HAC VICE upon the parties listed below by causing copies of the same to be sent by first-class US mail, with adequate postage prepaid, addressed as indicated below, as well as to parties to electronic service through the Court's CM/ECF electronic filing system:

Terri L. Gardner, Esq.
Nelson Mullins Riley & Scarborough, LLP
Post Office Box 30519
Raleigh, NC 27622

William P. Miller
Bankruptcy Administrator
101 South Edgeworth Street
Greensboro, NC 27401

/s/ Chelsea Corey

Chelsea Corey